

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

CIVIL ACTION

No. 02-3720

MORRONE'S WATER ICE, INC.,
a Pennsylvania corporation;
FRANCHISE CONSULTANTS CORPORATION,
a Pennsylvania corporation, d/b/a
FRANCHISE CONSULTANTS GROUP;
ICE AMERICA CORPORATION,
a Pennsylvania corporation;
WATER ICE SYSTEMS, INC.,
a Pennsylvania corporation;
JMS SALES, INC.,
a Pennsylvania corporation;
STEPHEN D. ALEARDI, a/k/a STEVE ALEARDI,
individually and as an officer of
FRANCHISE CONSULTANTS CORPORATION,
ICE AMERICA CORPORATION,
WATER ICE SYSTEMS, INC., and
JMS SALES, INC.; and
JOHN J. MORRONE, III, individually and as
an officer of ICE AMERICA CORPORATION,
WATER ICE SYSTEMS, INC.,
and JMS SALES, INC.,

Defendants.

STIPULATION

The undersigned parties hereby Agree and Stipulate the following:

1. As of the date of this Stipulation, representatives of the Plaintiff, the

Federal Trade Commission (“FTC” or “Commission”), have contacted and completed their interviews of Joseph Varvaro and Mary and Leonard Gustafson (“aforementioned persons”); and

2. The FTC agrees that having concluded these interviews, there is presently no further need for additional contact between the FTC and the aforementioned persons; and

3. If further contact with the FTC is initiated by Joseph Varvaro and/or Mary and/or Leonard Gustafson the FTC shall respond that this matter is before the Court and pursuant to Court Order, there is to be no communication with them by the FTC; and

4. In the event that in the future the FTC believes that there is a need for them to communicate with the aforementioned persons, they will contact counsel for defendant, John Morrone, prior to initiating such contact to see if defendants will consent to such contact; and

5. In the event that consent cannot be obtained pursuant to Paragraph 4 above, all parties agree that the question of whether there should be additional contact between the FTC and the aforementioned persons shall be determined by the Court.

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Debora A. O’Neill, Esquire
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Attorneys for Defendants, Morrone’s Water Ice, Inc.,
John J. Morrone, III, Ice America Corporation,
JMS Sales, Inc. and Water Ice Systems, Inc.

BY THE COURT

DATED: _____

JAN E. DUBOIS, J.

